

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Pamela Denise Jonjo aka Pamela D. Jonjo aka Pamela  
Jonjo

**Debtor**

Village Capital & Investment, LLC

**Movant**

vs.

Pamela Denise Jonjo aka Pamela D. Jonjo aka Pamela  
Jonjo

**Debtor**

Brenda L. Vaxter and Gena Mayers

**Co-Debtors**

Scott F. Waterman

**Trustee**

CHAPTER 13

CASE NO.: 21-13083

**ANSWER TO MOTION FOR RELIEF  
ON BEHALF OF DEBTOR**

AND NOW comes the Debtor, Pamela Denise Jonjo, by and through her attorneys, and answers the Motion for Relief from Automatic Stay by Village Capital & Investment, LLC, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
6. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
7. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.

8. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
9. Denied. Legal conclusion to which no response is required.
10. Denied. Legal conclusion to which no response in required.

**WHEREFORE**, Debtor respectfully requests an Order of this Court denying the Motion of Village Capital & Investment, LLC for Relief from the Automatic Stay.

Respectfully Submitted,

**NEWMAN WILLIAMS, P.C.**

By: /s/ Robert J. Kidwell, Esq.  
Robert J. Kidwell, Esq.  
712 Monroe Street  
Stroudsburg, PA 18360  
P: 570-421-9090  
F: 570-424-9739  
[rkidwell@newmanwilliams.com](mailto:rkidwell@newmanwilliams.com)  
*Attorney for Debtor*

Date: March 6, 2023